## WASHINGTON STATE DEPARTMENT OF ECOLOGY POST OFFICE BOX 47600 OLYMPIA, WASHINGTON 98504-7600

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Northwest Pipeline Corporation Mount Vernon Compressor Station Williams Gas Pipeline - West 295 Chipeta Way Salt Lake City, UT 84158-0900 NO. PSD-01-09 AMENDMENT FINAL APPROVAL OF PSD APPLICATION

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- 6 Pursuant to the United States Environmental Protection Agency (EPA) regulations for the
- 7 Prevention of Significant Deterioration (PSD) set forth in Title 40, Code of Federal Regulations,
- 8 Part 52 and regulations set forth in the Washington Administrative Code 173-400-141 and based
- 9 upon the application for amendment of Prevention of Significant Deterioration (PSD) Permit 01-
- 10 09 submitted by Williams Gas Pipeline West for the Northwest Pipeline Corporation Mount
- 11 Vernon Compressor Station on November 5, 2002 and the technical analysis performed by the
- 12 Department of Ecology (Ecology), Ecology now finds the following:

## 13 **FINDINGS**:

- Northwest Pipeline Corporation (NWP) proposes to expand their existing Mount Vernon
   Compressor Station (MVCS) located about nine miles east of Mt. Vernon, Washington (48°N
   16 25' 19" latitude, 122°W 12' 58"longitude).
- 2. MVCS is located within a Class II area that is currently designated in attainment for all national and state air quality standards.
- The site is 57 kilometers (km.) from the nearest Class I Area, North Cascades National Park,
   and within 100 km. of four other Class I areas (Alpine Lakes Wilderness, Glacier Peak
   Wilderness, Olympic National Park, and Pasayten Wilderness).
- 4. The site is about 45 kilometers from the U.S. Canadian border.
- 23 5. This project consists of
- 24 5.1 Adding one Mars 90-TI3002S (Mars 90S) gas turbine site-rated at 12,787 horsepower (59° F.),
- 5.2 Adding one Centaur 40-T4700S (Centaur 40S) gas turbine site-rated at 4,554 horsepower (59° F.),
- 28 5.3 Replacing an existing standby generator with one of larger capacity (450 kW), and
- 29 5.4 Replacing an existing 2.5 million British thermal units per hour (MMBtu/hr.) heater/boiler with one of larger capacity (4.186 MMBtu/hr. Sellers C100).
- This project is subject to New Source Performance Standards (NSPS): 40 CFR Subpart GG
   (Standards of Performance for Stationary Gas Turbines).

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- 7. The emissions of all air pollutants from the proposed modification are subject to review
- under Chapter 173-400 WAC, Chapter 173-460 WAC, and the regulations of the Northwest
- 35 Air Pollution Authority (NWAPA). Chapter 173-400 WAC includes provision for PSD
- review (WAC 173-400-141). This permit considers only PSD applicable issues. All other air
- 37 quality related notice of construction approval issues are subject to the Northwest Air
- Pollution Authority (1600 Second Street, Mt. Vernon, WA).
- 8. MVCS currently has the potential to emit more than 250 tons per year of any one pollutant
- 40 that is subject to the federal Clean Air Act. This qualifies MVCS as an existing major
- stationary source as defined in WAC 173-400-113(1)(b). Any net increases in potential
- emissions from the site that are considered significant under WAC 173-400-113(1)(a) will
- be subject to PSD review under WAC 173-400-141.
- 44 9. As a result of this project, the net increase in MVCS's potential to emit nitrogen oxides
- 45  $(NO_X)$  is 62.8 tons per year (TPY).
- 46 10. Because MVCS is an existing major stationary source, and the net emissions increase for
- NO<sub>X</sub> is more than 40 tons per year, the project qualifies as a major modification. [WAC 173-
- 48 400-113(1)(a), WAC 173-400-113(1)(b), WAC 173-400-113(1)(c), and WAC 173-400-
- 49 113(1)(d)]. As a result, the project is subject to PSD review under WAC 173-400-141.
- Additionally, the project is subject to federal PSD review because it qualifies as a major
- 51 modification under federal rules [40 CFR 52.21(b)(2)(i), 40 CFR 52.21(b)(3)(i), and 40 CFR
- 52 52.21(b)(23)(i)].
- 53 11. Other than NO<sub>X</sub>, the net emissions increases of all pollutants subject to regulation under the
- federal Clean Air Act are below the significance levels specified in 40 CFR 52.21(b)(23)(i).
- As a result, they are not subject to inclusion in this PSD permit.
- 12. The PSD permit application was submitted December 4, 2001, and determined to be
- 57 complete on January 3, 2002.
- 13. MVCS will operate the standby generator fewer than 500 hours in any calendar year. The
- 59 limit will be federally enforceable under the conditions of this PSD permit.
- 60 14. The Mars 90S turbine, the Centaur 40S turbine, the standby generator, and the heater/boiler
- being installed for this project will burn only natural gas from the pipeline.
- 62 15. Best Available Control Technology (BACT) determinations for NO<sub>X</sub> emissions:
- 15.1 Dry low-NO<sub>X</sub> control (SoLoNO<sub>X</sub>) for the Mars 90S and Centaur 40S turbines.
- 15.2 Non-selective catalytic reduction for the standby generator.
- 65 15.3 Good combustion practice for the Sellers C100 heater/boiler.
- 16. Allowable emissions from the new emissions units will not cause or contribute to air
- 67 pollution in violation of:
- 68 16.1 Any ambient air quality standard;
- 69 16.2 Any applicable maximum allowable increase over the baseline ambient concentration.

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  16.3 National Ambient Air Quality Standards NAAQS) and PSD increment consumption:
  Modeling to determine impacts was not required because the applicant demonstrated the impacts to be below modeling significance thresholds.
  - 16.4 Visibility impact in the surrounding Class I areas: The highest modeled impact was a 4.8% degradation which occurred in North Cascades National Park in mid-winter. Federal land manager guidance considers this to be below the "concern" threshold.
    - 16.5 Visibility impact in nearby Class II parks and recreational areas: The highest modeled impact in Mt. Baker Wilderness was a 6.2% degradation in mid-winter, and less than 4% the rest of the year. Federal land manager guidance considers this to be acceptable under PSD procedures and BACT requirements.
- 17. Ambient impact analysis indicates that there will be no significant pollutant deposition on soils and vegetation in the Class I or Class II areas.
  - 17.1 Modeled emissions ambient impact levels are substantially below all secondary NAAQS. This indicates a low likelihood of negative impact on Class II area flora and fauna. No sensitive species have been identified.
  - 17.2 NWP has agreed with the Washington Department of Fish and Wildlife to conduct a nesting survey for bald eagles expected to be in the vicinity of the facility.
  - 17.3 The highest modeled nitrogen deposition in the surrounding Class I areas is less than 50% of the "concern" threshold in federal land manager guidance.
- 18. No significant effect on industrial, commercial, or residential growth in the Mt. Vernon, Washington area is anticipated as a result of this project.
- 91 19. Ecology finds that all requirements for PSD have been satisfied. Approval of the PSD application is granted subject to the following conditions.

## **APPROVAL CONDITIONS:**

- The Mars 90S turbine, the Centaur 40S turbine, the standby generator, and the heater/boiler
   being installed for this project:
  - 1.1 Are only allowed to burn natural gas from the pipeline.
- NWP shall monitor and report (see Condition 8) the analytical data from the Sumas monitor location regarding the chemical composition of the fuel used to comply with Condition 1.1.
- 102 2. The standby generator:
- 103 2.1 NWP shall operate the standby generator no more than 500 hours in any consecutive 12 month period.
- 105 2.2 NWP shall monitor compliance with Condition 2.1 with
- 106 2.2.1 An hour meter for generator operation.

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- 107 2.2.2 NWP shall not reset the hour meter without written authorization of Ecology or NWAPA.
- 109 2.3 NO<sub>X</sub> emissions from the standby generator are limited to not greater than 82 grams per hour.
- 111 2.4 NWP shall demonstrate initial compliance with Condition 2.3:

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- 112 2.4.1 Within 180 days after initial startup, NWP will have a source test performed by an independent testing firm.
  - 2.4.2 The run-time on the standby generator for the initial compliance demonstration test shall not count toward the operating time limit in Condition 2.1.
  - 2.4.3 The source test shall be in accordance with 40 CFR 60 Appendix A, Methods 2, 2A, 2C, or 2D, and Method 7E.
    - 2.4.4 For the source test, NWP shall run the generator at maximum achievable load.
    - 2.4.5 NWP shall determine the emissions rate in units of grams per hour by using the source test results in applicable engineering calculations.
      - 2.4.6 NWP shall submit a test plan to Ecology and NWAPA for approval at least 30-days prior to testing.
      - 2.4.7 Within 90 days of initial startup, NWP will confirm to Ecology in writing that the existing standby generator has been taken out-of-service.
  - 2.5 NWP shall monitor compliance with Condition 2.3 by periodic NO<sub>X</sub> emission performance tests:
    - 2.5.1 NWP shall conduct  $NO_X$  emission performance tests not less frequently than once every 500 hours of operation.
    - 2.5.2 NWP may conduct the periodic performance tests by use of a portable  $NO_X$  analyzer verified as accurate in accordance with the process outlined in Condition 6.
      - 2.5.2.1 Testing shall be in accordance with USEPA Designated Conditional Test Method 34. An alternate test method may be used if approved in writing by Ecology or NWAPA at least 30 days prior to its first application.
      - 2.5.2.2 NWP shall follow the currently approved performance test procedure until acquiring approval from Ecology or NWAPA for a revised procedure.
      - 2.5.2.3 For the source test, NWP shall run the generator at maximum achievable load.
    - 2.5.3 NWP shall determine the emissions rate in units of grams per hour by using the source test results in applicable engineering calculations.
- 142 3. The 4.186 MMBtu/hr. Sellers C100 boiler:

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- 143 3.1 The NO<sub>X</sub> emissions concentration from the boiler stack is limited to not greater than 34 parts per million on a dry volumetric basis (ppmdv) over a twenty-four hour average when corrected to 3.0 percent oxygen.
- 146 3.2 NWP shall demonstrate initial compliance with Conditions 3.1:
- 3.2.1 Within 180 days after initial startup, performed by an independent testing firm.
- 3.2.2 By source test in accordance with 40 CFR 60 Appendix A, Methods 7E and 19.
- 149 3.2.3 NWP shall submit a test plan to Ecology and NWAPA for approval at least 30days prior to testing.
  - 3.2.4 Within 90 days of initial startup, NWP will confirm to Ecology in writing that the existing 2.5 MMBtu/hr. heater/boiler has been taken out-of-service.
  - 3.3 NWP shall monitor compliance with Condition 3.1 by periodic NO<sub>X</sub> emission performance tests:
    - 3.3.1 NWP shall conduct  $NO_X$  emission performance tests not less frequently than once each calendar year.
    - 3.3.2 NWP may conduct the periodic performance tests by use of a portable  $NO_X$  analyzer capable of adjustment to the 3% oxygen concentration basis, and verified as accurate in accordance with the process outlined in Condition 6.
      - 3.3.2.1 Testing shall be in accordance with USEPA Designated Conditional Test Method 34. An alternate test method may be used if approved in writing by Ecology or NWAPA at least 30 days prior to its first application.
      - 3.3.2.2 NWP shall follow the currently approved performance test procedure until acquiring approval from Ecology or NWAPA for a revised procedure.
    - 3.4 NO<sub>x</sub> emissions from the boiler are limited to not greater than
- 3.4.1 4 lbs./calendar day.
  - 3.4.2 0.66 tons in any twelve consecutive months.
- 169 3.5 NWP shall monitor compliance with Condition 3.4 by
  - 3.5.1 Keeping a log of the operating hours for the boiler, and
- 171 3.5.2 Using the following to determine the mass  $NO_X$  emissions:
- 3.5.2.1 The most recent performance test results intended to satisfy Condition 3.3.1.
- 3.5.2.2 Assume maximum achievable fuel consumption for all boiler operating hours.
  - 3.5.2.3 Use the appropriate F-factor from 40 CFR part 60, Appendix A Method 19 to estimate exhaust gas volumetric flowrate.
- 178 4. For the Mars 90S and Centaur 40S combustion turbines:
- 4.1 Startup is defined as any operating period that is ramping up from less than 90% of full

NO<sub>x</sub> analyzer capable of adjustment to the 15% oxygen

5.1.6.1.2.1 Testing shall be in accordance with USEPA

with the process outlined in Condition 6.

concentration basis, and verified as accurate in accordance

Designated Conditional Test Method 34. An

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217 218 219		alternate test method may be used if approved in writing by Ecology or NWAPA at least 30 days prior to its first application.
220 221 222 223		5.1.6.1.2.2 NWP shall follow the currently approved performance test procedure until acquiring approval from Ecology or NWAPA for a revised procedure.
224 225		Il monitor turbine operation continuously by a Parametric Monitoring System (PEMS). The PEMS shall consist of
226 227	5.1.6.2.1	A correlation between the design speed of the turbine and $NO_X$ exhaust emission concentration at 15% $O_2$ .
228 229 230	5.1.6.2.2	Measure and record the speed of the turbine in accordance with the PEMS methodology approved by Ecology or NWAPA.
231 232	5.1.6.2.3	Continuous comparison by programmable logic computer of the design speed with actual speed.
233 234 235 236 237	5.1.6.2.4	If actual turbine speed is less than the design speed, the instantaneous arithmetic mean of the First Stage Power Turbine Stator Inlet Temperatures (T5 temperatures) is compared by computer to the Swirler Bleed Valve T5 set point.
238 239 240 241 242	5.1.6.2.5	If the mean T5 temperature is greater than the Swirler Bleed Valve T5 set point by more than 5 ° F. for more than 30 consecutive minutes, NWP shall make appropriate repairs within 72 hours of detection or shut down the turbine until the problem is corrected.
243 244 245	5.1.6.2.6	Any T5 temperatures varying from the simultaneous mean T5 temperature by greater than $\pm 200^{\circ}$ F., shall be omitted from the calculation of the mean T5 temperature.
246 247 248 249 250	5.1.6.2.7	If any two adjacent T5 temperatures vary from the simultaneous mean T5 temperature by greater than ±200 ° F., NWP shall make appropriate repairs within 72 hours of detection or shut down the turbine until the problem is corrected.
251 252 253 254 255	5.1.6.2.8	If any three or more of the T5 temperatures vary from the simultaneous mean T5 temperature by greater than $\pm 200^{\circ}$ F., NWP shall make appropriate repairs within 72 hours of detection or shut down the turbine until the problem is corrected.
256 257	5.1.6.2.9	If the bleed valve duct temperature exceeds 350° F. when the turbine is at full load, NWP shall make appropriate repairs

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258 within 72 hours of detection or shut down the turbine until 259 the problem is corrected. 260 5.1.6.2.10 The correlation referred to in Condition 5.1.6.2.1 shall be 261 reestablished not less frequently than once each calendar 262 year. 263 5.1.6.2.11 The correlation referred to in Condition 5.1.6.2.1 shall be 264 developed and reestablished by measuring NO<sub>x</sub> concentrations in accordance with 40 CFR 60 Appendix A, 265 266 Method 20 except that the instrument span shall be reduced 267 as appropriate. 268 5.1.6.2.12 NWP shall submit a test plan related to Conditions 5.1.6.2.10 269 and 5.1.6.2.11 to Ecology and NWAPA for approval at least 270 30 days prior to testing. 271 5.1.6.2.13 Within forty-five days of the test used to establish or 272 reestablish the correlation referred to in Condition 5.1.6.2.1, 273 NWP shall submit the correlation to Ecology and NWAPA 274 for approval. 275 5.1.6.3 Within twenty days of the end of each month, NWP shall determine by 276 using the PEMS correlation the tons of NO<sub>X</sub> emissions for the most recent consecutive twelve months. 277 278 5.2 For the Centaur 40S combustion turbine: 279 Not greater than 25 parts per million NO<sub>X</sub> emission concentration on a dry 5.2.1 280 volumetric basis (ppmdv) over a three hour average when corrected to 15.0 281 percent oxygen, ISO. 282 5.2.2 Condition 5.2.1 is relieved during startup and shutdown. 283 5.2.3 Mass emissions of NO<sub>X</sub> shall not exceed 284 5.2.3.1 106 lbs. NO<sub>X</sub>/calendar day. 285 5.2.3.2 18.5 tons of NO<sub>X</sub> for any consecutive twelve month period. 286 5.2.4 NWP shall count emissions during startup and shutdown towards monitoring 287 compliance with the twelve month mass emission limit in Condition 5.2.3 at a 288 rate of 2 lbs. NO<sub>X</sub> per startup or shutdown. 289 5.2.5 NWP shall demonstrate initial compliance with Condition 5.2.1: 290 5.2.5.1 Initial compliance shall be demonstrated within 180 days after initial 291 startup, performed by an independent testing firm. 292 5.2.5.2 Initial compliance shall be demonstrated in accordance with 40 CFR 60 293 Subpart GG and 40 CFR 60 Appendix A, Method 20 except that the 294 instrument span shall be reduced as appropriate. 295 5.2.5.3 NWP shall submit a test plan to Ecology and NWAPA for approval at 296 least 30-days prior to testing.

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5.2.6 Compliance monitoring:

297	5.2.6	Compliance monitoring:		
298 299		5.2.6.1 NWP shall monitor compliance with Condition 5.2.1 by measuring the NO <sub>X</sub> concentration of the turbine exhaust stack		
300 301 302		5.2.6.1.1	The turbine exhaust stack $NO_X$ concentration shall be monitored not less frequently than once every 336 hours of turbine operation.	
303 304 305 306		5.2.6.1.2	NWP may conduct these measurements by use of a portable $NO_X$ analyzer capable of adjustment to the 15% oxygen concentration basis, and verified as accurate in accordance with the process outlined in Condition 6.	
307 308 309 310 311			5.2.6.1.2.1 Testing shall be in accordance with USEPA Designated Conditional Test Method 34. An alternate test method may be used if approved in writing by Ecology or NWAPA at least 30 days prior to its first application.	
312 313 314 315			5.2.6.1.2.2 NWP shall follow the currently approved performance test procedure until acquiring approval from Ecology or NWAPA for a revised procedure.	
316 317			l monitor turbine operation continuously by a Parametric Monitoring System (PEMS). The PEMS shall consist of	
318 319		5.2.6.2.1	A correlation between the design speed of the turbine and $NO_X$ exhaust emission concentration at 15% O2.	
320 321 322		5.2.6.2.2	Measure and record the speed of the turbine in accordance with the PEMS methodology approved by Ecology or NWAPA.	
323 324		5.2.6.2.3	Continuous comparison by programmable logic computer of the design speed with actual speed.	
325 326 327 328		5.2.6.2.4	If actual turbine speed is less than the design speed, the instantaneous arithmetic mean of the First Stage Power Turbine Stator Inlet Temperatures (T5 temperatures) is compared by computer to the T5 set point.	
329 330 331 332		5.2.6.2.5	If the mean T5 temperature is greater than the T5 set point by more than 5° F. for more than 30 consecutive minutes, NWP shall make appropriate repairs within 72 hours of detection or shut down the turbine until the problem is corrected.	
333 334 335		5.2.6.2.6	Any T5 temperatures varying from the simultaneous mean T5 temperature by greater than $\pm 200^{\circ}$ F., shall be omitted from the calculation of the mean T5 temperature.	

Mount Vernon Compressor Station PSD-01-09 If any two adjacent T5 temperatures vary from the 336 5.2.6.2.7 simultaneous mean T5 temperature by greater than ±200 ° F., 337 NWP shall make appropriate repairs within 72 hours of 338 339 detection or shut down the turbine until the problem is 340 corrected. 341 5.2.6.2.8 If any three or more of the T5 temperatures vary from the simultaneous mean T5 temperature by greater than ±200 ° F., 342 343 NWP shall make appropriate repairs within 72 hours of 344 detection or shut down the turbine until the problem is 345 corrected. 346 If the bleed valve duct temperature exceeds 350° F. when the 5.2.6.2.9 347 turbine is at full load, NWP shall make appropriate repairs 348 within 72 hours of detection or shut down the turbine until 349 the problem is corrected. 350 5.2.6.2.10 The correlation referred to in Condition 5.2.6.2.1 shall be 351 reestablished not less frequently than once each calendar 352 vear. 353 5.2.6.2.11 The correlation referred to in Condition 5.2.6.2.1 shall be 354 developed and reestablished by measuring NO<sub>X</sub> 355 concentrations in accordance with 40 CFR 60 Appendix A. 356 Method 20 except that the instrument span shall be reduced 357 as appropriate. 358 5.2.6.2.12 NWP shall submit a test plan related to Conditions 5.2.6.2.10 359 and 5.2.6.2.11 to Ecology and NWAPA for approval at least 360 30 days prior to testing. 361 5.2.6.2.13 Within forty-five days of the test used to establish or 362 reestablish the correlation referred to in Condition 5.2.6.2.1. NWP shall submit the correlation to Ecology and NWAPA 363 364 for approval. 365 5.2.6.3 Within twenty days of the end of each month, NWP shall determine by 366 using the PEMS correlation the tons of NO<sub>X</sub> emissions for the most 367 recent consecutive twelve months. 368 369

6. NWP shall verify the accuracy of any portable NO<sub>x</sub> analyzers used to satisfy the monitoring requirements of this permit.

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- 6.1 NWP shall submit a protocol for written approval to Ecology or NWAPA for verifying the accuracy of any portable NO<sub>X</sub> analyzer prior to its use in satisfaction of the monitoring requirements of this permit.
- 373 6.2 NWP shall use the approved protocol from Condition 6.1 to verify the accuracy of any portable NO<sub>X</sub> analyzer prior to its use in satisfaction of the monitoring requirements of 374 this permit.

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Not less than once every calendar year, NWP shall use the approved protocol from Condition 6.1 to verify the accuracy of any portable NO<sub>X</sub> analyzer intended to be used in satisfaction of the monitoring requirements of this permit.

- NWP shall keep records of the NO<sub>X</sub> analyzer accuracy verifications on-site for not less than five years for Ecology or NWAPA review.
- NWP shall provide safe access and sampling ports for source testing of the standby generator, the heater/boiler, the Mars 90S turbine, and the Centaur 40S turbine being installed for this project, after each final pollution control device:
- 384 7.1 Safe access for the standby generator and the heater/boiler shall consist of not less than a man-lift or situation-specific scaffolding.
- 386 7.2 Safe access for the Mars 90S turbine, the Centaur 40S turbine shall consist of permanently constructed platforms on the respective stacks.
- The sampling ports shall meet the requirements of 40 CFR, Part 60, Appendix A, Method 20.
- 390 7.4 Other arrangements may be acceptable if approved by Ecology prior to installation.
- 391 8. NWP shall report the monitoring and process data from MVCS to Ecology and NWAPA as follows:
- 393 8.1 Notifications:

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- 8.1.1 Commencement of construction of the project described in Finding 5 of this permit: In accordance with 40 CFR 60.7(1), no later than 30 calendar days after such date.
  - 8.1.2 Initial startup of the project described in Finding 5 of this permit: In accordance with 40 CFR 60.7(3), no later than 15 calendar days after such date.
  - 8.1.3 Completion of the entry into the operation and maintenance manual of the items specified in Condition 9.
  - 8.1.4 In the first quarterly report required under Condition 8.2, certification by the responsible party for the facility that the relevant equipment was installed consistent with the parameters developed pursuant to Condition 9.
  - 8.1.5 The date on which the NO<sub>x</sub> PEMS first demonstrated satisfactory performance pursuant to Condition 5.1.1, no later than 30 calendar days after such date.
- 8.2 Submit reports not less than once each calendar quarter or on another reporting schedule approved by Ecology, and in the format approved by Ecology.
  - 8.3 The reports shall include, but not necessarily be limited to the following:
    - 8.3.1 Certification by the responsible party for the facility that only natural gas from the pipeline has been used as fuel.
- 411 8.3.2 Analytical data on the fuel composition per Condition 1.2.

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412 8.3.3 Certification by the responsible party for the facility that the relevant equipment was operated and maintained in accordance with the operational parameters and 413 414 practices developed pursuant to Condition 9.2. 415 8.3.4 For the standby generator: 8.3.4.1 Total hours of operation for the twelve immediately preceding months. 416 417 8.3.4.2 The total NO<sub>x</sub> mass emissions for the twelve immediately preceding 418 months. 419 8.3.4.3 Results of any compliance monitoring source tests performed since the 420 last report. 8.3.5 For the 4.186 MMBtu/hr. Sellers C100 boiler: 421 422 8.3.5.1 The total NO<sub>X</sub> mass emissions for the twelve immediately preceding 423 months. 424 8.3.5.2 Results of any compliance monitoring source tests performed since the 425 last report. 426 8.3.6 For each combustion turbine stack, 427 8.3.6.1 All exhaust stack NO<sub>X</sub> concentrations since the last report pursuant to measurement under Conditions 5.1.6.1 and 5.2.6.1. 428 429 8.3.6.2 The total NO<sub>x</sub> mass emissions for the twelve immediately preceding 430 months ending with each month included in the report. 431 8.3.6.3 Identification of any periods for which turbine operating data were not 432 obtained that would be applicable to the NO<sub>x</sub> emissions concentrations -433 PEMS correlation. For such periods, include the following: 434 8.3.6.3.1 Reasons for not obtaining sufficient data, and 435 8.3.6.3.2 Description of corrective actions taken. 436 8.3.6.4 Description of any modifications to the PEMS that could affect the 437 ability of the system to comply with Conditions 5.1.1, 5.1.3, 5.2.1, and 5.2.3. 438 439 8.3.6.5 Results of any compliance monitoring source tests performed since the 440 last report including verification of the accuracy of NO<sub>X</sub> concentration 441 portable analyzers emissions allowed in Conditions 2.5.2, 3.3.2, 442 5.1.6.1.2, and 5.2.6.1.2. 443 8.3.6.6 For each occurrence of NO<sub>X</sub> monitored emissions pursuant to 444 measurement under Conditions 5.1.6.1 and 5.2.6.1 in excess of the limits 445 in Conditions 5.1.1 or 5.2.1 or out-of-spec operation as defined in 446 Conditions 5.1.6.2.5, 5.1.6.2.7, 5.1.6.2.8, 5.1.6.2.9, 5.2.6.2.5, 5.2.6.2.7, 447 5.2.6.2.8, or 5.2.6.2.9: 448 8.3.6.6.1 The time of the occurrence. Magnitude of the emission or process parameters excess. 449 8.3.6.6.2

Draft PSD Permit Northwest Pipeline Corporation Mount Vernon Compressor Station PSD-01-09 8.3.6.6.3 The duration of the excess. 8.3.6.6.4 The probable cause. 8.3.6.6.5 Corrective actions taken or planned. 8.3.6.6.6 Any other agency contacted. 8.4 NWP shall maintain MVCS monitoring and process records for at least five years. NWP shall inform Ecology and NWAPA on the location of the monitoring and process records. 8.4.2 NWP shall provide Ecology and NWAPA with the monitoring and process records for any period within the five year archive within ten working days of request.

- 8.4.3 The monitoring and process records maintained in the five year archive shall include but not necessarily be limited to the following:
  - 8.4.3.1 Fuel monitoring records pursuant to Condition 1.2.
  - 8.4.3.2 Operating time records pursuant to Condition 2.2.
  - 8.4.3.3 Operating hours records pursuant to Condition 3.5.1.
    - 8.4.3.4 Turbine speed records pursuant to Conditions 5.1.6.2.2 and 5.2.6.2.2.
  - 8.4.3.5 Record of startups and shutdowns for the Mars 90S and Centaur 40S turbines pursuant to Condition 4.3.
- 468 9. Operation and maintenance (O&M) manual for the facility:

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- 469 Within 90 days of startup, NWP shall identify operational parameters and practices for MVCS. 470
  - 9.1.1 The operational parameters and practices will constitute proper operation relative to compliance with the emission limitation conditions of this permit.
  - 912 The operational parameters and practices will be for the standby generator, the 4.186 MMBtu/hr. Sellers C100 boiler, and the combustion turbines.
- 475 NWP shall include these operational parameters and practices in the MVCS O&M 476 manual. As a minimum, these shall include
  - 9.2.1 Manufacturers' operating instructions and design specifications.
- 478 9.2.2 Normal operating parameters and design specifications.
  - Procedures for response to PEMS alarm conditions. 9.2.3
- 480 9.2.4 Updates to reflect any modifications of the equipment or its operating 481 procedures.
- 482 9.3 NWP shall keep the MVCS O&M manual up-to-date.
- 483 9.4 NWP shall assure that the MVCS O&M manual is readily available at the facility for 484 review by state, federal and local agencies.

Page 14 Draft PSD Permit Northwest Pipeline Corporation Mount Vernon Compressor Station PSD-01-09 485 10. Nothing in this determination shall be construed so as to relieve NWP of its obligations under 486 any state, local, or federal laws or regulations. 487 11. NWP shall permit the Environmental Protection Agency, state, and local regulatory 488 personnel access to the source upon request for the purposes of compliance assurance 489 inspections. Failure to allow such access is grounds for an enforcement action. 490 12. This approval shall become invalid if construction of the project is not commenced within 491 eighteen (18) months after receipt of the final approval, or if construction of the facility is 492 discontinued for a period of eighteen (18) months, NWP extends the 18 month period upon 493 satisfactorily showing that an extension is justified, pursuant to 40 C.F.R. 52.21(r)(2) and 494 applicable EPA guidance. 495 496 497 Reviewed by: 498 499 DATE:\_\_\_\_ 500 501 Bernard Brady, P.E. 502 Technical, Information, and Engineering Services 503 Air Quality Program 504 Washington State Department of Ecology 505 506 Approved by: 507 508 DATE:\_\_\_\_ 509

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